

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

Team Systems International, LLC,

Debtor(s).

Chapter 11

Case No. 22-10066-CTG

**CREDITORS' WITNESS LIST AND EXHIBIT LIST FOR HEARING**

Creditors, GPDEV, LLC AND SIMONS EXPLORATION, INC., ("**Creditors**"), by and through their undersigned counsel, hereby submit the enclosed witness and exhibit list for the hearing presently scheduled for February 9, 2022 at 1:00 p.m. (Eastern Time) for GPDEV, LLC and Simons Exploration, Inc.'s Motion for Entry of an Order Dismissing Chapter 11 Case with Prejudice (the "**Motion to Dismiss**") [D.I. 41].

Dated: February 7, 2022

Respectfully submitted,

KASEN & KASEN, P.C.

/s/ Jenny R. Kasen

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-and-

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*Counsel to GPDEV, LLC and SIMONS  
EXPLORATION, INC.*

## Creditors' Witness List:

Name	Title	E-Mail Address	Location for Testimony	Summary of Subject Matter of Anticipated Testimony
George Peterson	Principal of GPDEV, LLC	<a href="mailto:GPeterson@projectdimensions.com">GPeterson@projectdimensions.com</a>	4 Park Plaza, Suite 700, Irvine, CA 92614	Matters relating to Creditor's Motion to Dismiss/Related Relief
Jordan Simons	Principal of Simons Exploration, Inc.	<a href="mailto:jordansimons77@gmail.com">jordansimons77@gmail.com</a>	542 N. Cherokee Ave, Los Angeles, CA 90004	Matters relating to Creditor's Motion to Dismiss/Related Relief
Leonard Collins	Shareholder Gray Robinson, P.A.	<a href="mailto:leonard.collins@gray-robinson.com">leonard.collins@gray-robinson.com</a>	301 South Bronough Street, Suite 600, Tallahassee, FL 32301	Matters relating to Creditor's Motion to Dismiss/Related Relief
Ryan Orner	President, RJOmer & Company, LLC	<a href="mailto:riomer@riomer.com">riomer@riomer.com</a>	301 South Bronough Street, Suite 600, Tallahassee, FL 32301	Matters relating to Creditor's Motion to Dismiss/Related Relief

## Creditors' Exhibit List:

No.	Description
1	Bank Statements Artisans # 2968 September 21, 2021 through January 31, 2022
2	Bank Statements BBVA # 7965 January 1, 2018 through October 31, 2020
3	Bank Statements BBVA # 8953 January 1, 2018 through January 22, 2019
4	Bank Statements BBVA # 9759 January 1, 2018 through August 31, 2021
5	Bank Statements BBVA #1519 January 1, 2018 through November 30, 2018
6	Bank Statements BBVA #2888 March 26, 2019 through October 8, 2021
7	Bank Statements TD # 3152 July 27, 2018 through May 31, 2019
8	Bankruptcy Docket
9	Bankruptcy Docket [D.I. 1] Petition
10	Bankruptcy Docket [D.I. 3] First Day Affidavit
11	Bankruptcy Docket [D.I. 13] Creditors' Notice of Service of Subpoena for Debtor to Produce Documents
12	Bankruptcy Docket [D.I. 28] Schedules
13	Bankruptcy Docket [D.I. 29] SOFA
14	Bankruptcy Docket [D.I. 56] Amended Schedule E/F
15	Debtor's Articles of Organization
16	Debtor's Income Statement 2018
17	Debtor's Income Statement 2019
18	Debtor's Operating Agreement
19	Debtor's Receipt of \$37M from FEMA for Bottled Water Sales
20	District Court Action - Docket
21	District Court Action [D.I. 58] Order Denying Debtor's Motion to Dismiss and Transfer
22	District Court Action [D.I. 105] 2.3.20 Creditors' Motion to Compel Discovery and Impose Sanctions
23	District Court Action [D.I. 123] Debtor's Response to Creditors' Motion to Compel Discovery
24	District Court Action [D.I. 133] District Court Order Compelling Document Production and Awarding Attorney's Fees
25	District Court Action [D.I. 230] 3.30.21 Creditors' Motion for Evidentiary Hearing and Sanctions against Debtor
26	District Court Action [D.I. 243] 5.8.21 District Court Order Addressing Late and Incomplete Document Production
27	District Court Action [D.I. 305] Order for Entry of Judgment Against Debtor
28	District Court Action [D.I. 322] District Court Order Denying a Stay Pending Appeal
29	District Court Action [D.I. 322] District Court Order Denying Stay Pending Appeal
30	District Court Action [D.I. 333] District Court Order to Show Cause
31	District Court Action [D.I. 340] 1.7.22 Debtor's Motion for Extension of Time to Comply with Court Orders
32	District Court Action [D.I. 346] District Court Order Authorizing Creditors' Subpoenas and Setting Preliminary Hearing on Show Cause Motion Dated January 19, 2022
33	District Court Action Appeal 11th Circuit 1.10.22 Order Denying Stay Pending Appeal
34	District Court Action Post Judgment PNC Reponse to Writ of Garnishment
35	District Court Action Post-Judgment Discovery Creditors' First Requests for Production in Aid of Execution
36	District Court Action Post-Judgment Discovery Creditors' First Set of Interrogatories in Aid of Execution
37	District Court Action Post-Judgment Discovery Fact Information Sheet
38	District Court Action Transcript of Jury Trial Day 3
39	FEMA Litigation 4.30.21 Contracting Officers Denial of Restocking Fee pdf
40	FEMA Litigation 7.8.21 1 Debtor/Appellant's Complaint
41	FEMA Litigation 7.8.21 Debtor/Appellant's Amended Complaint
42	FEMA Litigation Debtor/Appellant's Motion for Summary Judgment
43	FEMA Litigation Debtor/Appellant's Summary Judgment Reply Brief
44	FEMA Litigation Denial of Summary Judgment Motions 1.27.22
45	Other Entity Addy Road Annual Report 2021
46	Other Entity Addy Road LLC Articles of Organization
47	Other Entity Addy Road LLC Delaware Division of Corporations - Filing
48	Other Entity CDX Industries LLC Articles of Organization
49	Other Entity CDX Industries LLC SAM Code
50	Other Entity Team Systems International Agency II LLC Articles of Organization
51	Other Entity Team Systems International Southeast LLC Articles of Organization
52	Other Entity Team Systems International Southeast LLC Change of Registered Agent
53	Real Estate Addy Road LLC Bethany Beach Delaware Deed
54	Real Estate Addy Road LLC Bethany Beach Delaware Purchase Price Report
55	Real Estate Addy Road LLC Bethany Beach Delaware Sunbiz Report
56	Real Estate Addy Road LLC Bethany Beach Delaware
57	Real Estate Addy Road LLC property search
58	Real Estate Jackson County Missouri - Real Estate Sales Search Results with Purchase Price
59	Real Estate Jackson County Missouri Deed - to Deborah Mott[1]
60	Real Estate Jackson County Missouri Property - Real Estate Sales Search Results with Purchase Price[1]
61	Real Estate Jackson County Missouri Property
62	Real Estate Jackson Missouri Deed - to Deborah Mott
63	Real Estate Ormond Beach Florida Property
64	Social Media 1.9.22 (1 of 2)
65	Social Media 1.9.22 (2 of 2)
66	Tax Return 2018
67	Tax Return 2019
68	Transfers to Insiders # 1519
69	Transfers to Insiders # 2888
70	Transfers to Insiders # 8953
71	Transfers to Insiders # 9759
72	Transfers to Insiders #7965
73	Transfers to Insiders Venmo
74	Voicemail January 27, 2022 Transcript
75	Payments from FEMA to Debtor
76	Payments from FEMA to Debtor
77	Bank Account Transaction Details
78	Bank Report 7965
79	Bank Report 8953
80	Bank Report 9759
81	FEMA Voucher
82	FEMA Voucher
83	Vendor Report
84	Debtor's Payment to Coakley
85	Debtor's Payment to Coakley
86	Debtor's Payment to Bering Straits Payment